

## **EXHIBIT 1**

# FTC Business Alert

Federal Trade Commission ■ Bureau of Consumer Protection ■ Division of Consumer & Business Education

## How to Avoid Bamboozling Your Customers

Marketers looking to provide more environmentally friendly choices to consumers may have heard about bamboo, which has been recognized for its ability to grow quickly with little or no need for pesticides. But when it comes to textile products made from bamboo, that's not the whole story.

The truth is, most “bamboo” textile products, if not all, really are rayon, which typically is made using environmentally toxic chemicals in a process that emits hazardous pollutants into the air. While different plants, including bamboo, can be used as a source material to create rayon, there's no trace of the original plant in the finished rayon product.

If you make, advertise or sell bamboo-based textiles, the Federal Trade Commission, the nation's consumer protection agency, wants you to know that unless a product is made directly with bamboo fiber — often called “mechanically processed bamboo” — it can't be called bamboo. Indeed, to advertise or label a product as “bamboo,” you need competent and reliable evidence, such as scientific tests and analyses, to show that it's made of actual bamboo fiber. Relying on other people's claims isn't substantiation. The same standard applies to other claims, like a claim that rayon fibers retain natural antimicrobial properties from the bamboo plant.

If you sell clothing, linens, or other textile products, you're responsible for making truthful disclosures about the fiber content. If your product isn't made directly of bamboo fiber — but is a manufactured fiber for which bamboo was the plant source — it should be labeled and advertised using the proper generic name for the fiber, such as rayon, or “rayon made from bamboo.”

Any claims you make about your textile products have to be true and cannot be misleading. As the seller, you must have substantiation for each and every claim — express and implied — that you make.

## For More Information

For more information on advertising and labeling rayon and other textile products, see *Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts*. For guidance on making environmental marketing claims, see *Complying with the Environmental Marketing Guides*. These and other guides for business are at [ftc.gov/bcp/business.shtm](http://ftc.gov/bcp/business.shtm).

The FTC works for the consumer to prevent fraudulent, deceptive and unfair business practices in the marketplace and to provide information to help consumers spot, stop and avoid them. To file a complaint or to get free information on consumer issues, visit [ftc.gov](http://ftc.gov) or call toll-free, 1-877-FTC-HELP (1-877-382-4357); TTY: 1-866-653-4261. The FTC enters consumer complaints into the Consumer Sentinel Network, a secure online database and investigative tool used by hundreds of civil and criminal law enforcement agencies in the U.S. and abroad.



August 2009